Supreme Court, U.S.
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No. 00-84

IN THE

Supreme Court of the United States

DAVID R. BURROUGHS
as father, next friend and guardian of his minor children,
Zachary R. Burroughs and Alexandra J. Burroughs,

Petitioner,

v.

DOMESTIC VIOLENCE PROJECT, DELAWARE FAMILY COURT DOMESTIC VIOLENCE INTAKE UNIT, BRIDGET POULLE, DEBBIE ALLEN, HON. CAROLEE M. GRILLO, LOIS DAWSON and LINDA J. OLSEN BURROUGHS,

Respondents.

ON PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

BRIEF IN OPPOSITION FOR RESPONDENT LOIS DAWSON

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Respondent, Lois Dawson, Esquire, respectfully asks that Your Honorable Court deny David R. Burroughs' petition for writ of certiorari.

As reflected in their respective, unpublished opinions, both the Court of Appeals and the District Court cogently and correctly perceived that Mr. Burroughs' claims were inextricably intertwined with the merits of the state courts' rulings. Mr. Burroughs' claims were thus subject to the *Rooker-Feldman* doctrine, because they effectively asked the federal courts to act as appellate courts to review and adjudicate the constitutionality of the state courts' proceedings and rulings.

Respondent Dawson also suggests that the petition should be denied as to her, because Mr. Burroughs' purported restriction of his claims to a quest for prospective injunctive relief to reform Delaware' domestic relations operations presents a case to which respondent Dawson is not a proper party.

For those reasons and for the reasons presented by the lower courts' opinions and by the other respondents, respondent, Lois Dawson, Esquire, respectfully asks Your Honorable Court to deny Mr. Burroughs' petition for writ of certiorari.

Respectfully submitted,

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